

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN) ECF Case
---	-----------------------------------

This document relates to:

*Maureen Moody-Theinert et al. v. Islamic Republic of Iran, 1:18-cv-11876 (GBD) (SN)*

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that Plaintiffs in the above-referenced matter, by undersigned counsel and in accordance with F.R.C.P. 15, respectfully request that this Court grant Plaintiffs' Motion for Leave to Amend to Correct Errors. No adverse parties have appeared in this proceeding, and the Clerk issued a Certificate of Default on August 13, 2019.

In support of this motion, Plaintiffs submit the following memorandum of law and a proposed order.

Dated: August 14, 2019

/s/ Jerry S. Goldman

ANDERSON KILL P.C.  
Jerry S. Goldman, Esq.  
Bruce E. Strong  
1251 Avenue of the Americas  
New York, NY 10020  
Tel: 212-278-1000  
Fax: 212-278-1733  
Email: [jgoldman@andersonkill.com](mailto:jgoldman@andersonkill.com)

Arthur R. Armstrong, Esq. (*pro hac vice*)  
1760 Market Street, Suite 600  
Philadelphia, PA 19103  
Tel: 267-216-2711  
Fax: 215-568-4573  
Email: [aarmstrong@andersonkill.com](mailto:aarmstrong@andersonkill.com)

*Attorneys for Plaintiffs*